

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE:

BV MANAGEMENT LLC

Debtor

Case No. 22-10662-BFK
Chapter 7

APPELLANT'S STATEMENT OF ISSUES ON APPEAL

Janet M. Meiburger, Chapter 7 Trustee, pursuant to Federal Rule of Bankruptcy Procedure 8009, states the following issues that she intends to present in her appeal.

1. Whether the Bankruptcy Court erred in sustaining the objection of The Fred Gumbinner Living Trust and G2 BVM, LLC to the Trustee's Final Report.
2. Whether the Bankruptcy Court erred in holding that the late-filed amendments to Claims 8 and 9 were not new claims.
3. Whether the Bankruptcy Court erred in holding that, as a matter of law, there could be no prejudice to other creditors from the late amendments to Claims 8 and 9.
4. Whether the Bankruptcy Court erred in not taking into account the culpability of the claimants for the lateness of the claim amendments or the length of the delay in filing the claim amendments.
5. Whether the Bankruptcy Court erred in its application of other factors under Federal Rule of Civil Procedure 15.

Respectfully submitted,

Janet M. Meiburger, VA Bar No. 31842
The Meiburger Law Firm, P.C.
1487 Chain Bridge Road, Suite 200
McLean, VA 22101
(703) 556-7871
Counsel for Chapter 7 Trustee

THE MEIBURGER LAW FIRM, P.C.

Dated: August 6, 2025

By: /s/ Janet M. Meiburger

Janet M. Meiburger, Esq., VSB No. 31842
The Meiburger Law Firm, P.C.
1487 Chain Bridge Road, Suite 200
McLean, Virginia 22101
(703) 556-7871
Counsel to Chapter 7 Trustee

CERTIFICATE OF SERVICE

I HEREBY certify that on this 6th day of August, 2025, a true and correct copy of the foregoing Appellant's Statement of Issues on Appeal will be served by ECF e-mail pursuant to the applicable Standing Order of the Court.

/s/ Janet M. Meiburger

Janet M. Meiburger

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